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SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ALEX PACE MCDOUGAL,

Defendant.

INDICTMENT

Counts 1-3: 18 U.S.C. § 1343, Wire Fraud

Counts 4-5: 18 U.S.C. § 1028A(a)(1),
Aggravated Identity Theft

The Grand Jury charges:

Case: 2:22-cr-00472
Assigned To : Nielson, Howard C., Jr
Assign. Date : 11/29/2022

A. BACKGROUND

At all times relevant to this Indictment:

1. ALEX PACE MCDOUGAL was a resident of Utah, living principally in Salt Lake or Davis Counties.
2. The Federal Deposit Insurance Corporation (FDIC) was an organization of the United States government that underwrote customer deposits at qualifying banks and similar financial institutions.

3. The National Credit Union Administration (NCUA) was an organization of the United States government that underwrote customer deposits at qualifying credit unions and similar financial institutions.
4. Goldenwest Credit Union (Goldenwest CU) was a credit union headquartered in Utah. It was a financial institution as defined by 18 U.S.C. § 20 and insured by the NCUA.
5. Sheffield Financial (Sheffield) was a subsidiary of Truist Bank, headquartered in North Carolina. It was a financial institution as defined by 18 U.S.C. § 20 and insured by the FDIC.
6. Eaglemark Savings Bank (Eaglemark) was a subsidiary of Harley-Davidson Financial Services, Inc., headquartered in Nevada. It was a financial institution as defined by 18 U.S.C. § 20 and insured by the FDIC.
7. E. B. was a resident of California whose full name is known to the Grand Jury.
8. J.C. was a resident of Utah whose full name is known to the Grand Jury.

B. THE SCHEME TO DEFRAUD

- June 2021
9. Beginning in or about ~~January~~ of ~~2022~~, and continuing until in or about June of 2022, in the District of Utah, and elsewhere, Defendant ALEX PACE MCDOUGAL, knowingly and with intent to defraud, devised and executed a scheme and artifice to obtain monies, funds, credits, assets and other property owned by and in the custody and control of financial institutions by

means of materially false and fraudulent pretenses, representations and promises, and the concealment of material facts.

10. The fraudulent scheme operated and was carried out, in substance, as follows:
 - a. Defendant MCDOUGAL submitted, and caused to be submitted, over the Internet, applications for credit in the names of other people whose personal identifying information MCDOUGAL had obtained, without the knowledge or permission of the owners of the information.
 - b. If the credit was approved, MCDOUGAL then used the credit to purchase merchandise, including Harley-Davidson brand motorcycles, automobiles of various brands, and other items.
 - c. MCDOUGAL then kept those items for his own use or sold them for monetary gain, generally using the Internet to facilitate sale of the items.
 - d. In order to substantiate his fraudulent ownership of the items, MCDOUGAL would sometime create false documents such as titles in the names of the people whose identities he was using.

C. EXECUTION OF THE SCHEME – USE OF WIRES

COUNTS 1-3
18 U.S.C. § 1343
(Wire Fraud)

11. Paragraphs 1-10 are incorporated herein by reference.
12. On or about the dates listed below, in the District of Utah and elsewhere,

ALEX PACE MCDOUGAL,

Defendant herein, for the purpose of executing and attempting to execute the above-described scheme to defraud, attempted to transmit and caused to be transmitted by means of wire communication in interstate commerce, signals and sounds as described in the table below, each transmission constituting a separate count:

COUNT	DATE (on or about)	USE OF WIRES
1	1/11/2022	Submission by MCDOUGAL via the Internet of a loan application to Goldenwest CU for the purchase of a 2020 Chevrolet Silverado 15 truck in the amount of \$64,929.22 from Karl Malone Toyota in Park City, Utah, using the name and other identifying information of E.B.
2	2/17/2022 <i>2021</i>	Submission by MCDOUGAL via the Internet of a loan application to Sheffield for the purchase of a 7.5x14 Stealth model Alcom Trailer in the amount of \$10,799.41 from Wasatch Trailer Sales in Kaysville, Utah, using the name and other identifying information of E.B.
3	6/26/ 2022	Submission by MCDOUGAL via the Internet of a loan application to Eaglemark for the purchase of a 2017 FLHRXS Harley-Davidson motorcycle in the amount of \$26,157.91 from Golden Spike Harley-Davidson in Ogden, Utah, using the name and other identifying information of J.C.

all in violation of 18 U.S.C. § 1343, Wire Fraud.

COUNT 4
18 U.S.C. § 1028A(a)(1)
(Aggravated Identity Theft)

13. Paragraphs 1-12 are incorporated herein by reference.

14. On or about January 11, 2022 and February 17, 2022, in the District of Utah and elsewhere,

ALEX PACE MCDOUGAL,

did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, to wit: the name and other identifiers of E.B.; during and in relation to felony violations enumerated in 18 U.S.C. § 1028A(c), to wit: Wire Fraud as described above in Counts 1-2, which counts are incorporated herein by reference, knowing that the means of identification belonged to another actual person; all in violation of 18 U.S.C. § 1028A(a)(1), Aggravated Identity Theft.

COUNT 5

**18 U.S.C. § 1028A(a)(1)
(Aggravated Identity Theft)**

15. Paragraphs 1-12 are incorporated herein by reference.

16. On or about June 26, ²⁰²¹~~2022~~, in the District of Utah and elsewhere,

ALEX PACE MCDOUGAL,


did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, to wit: the name and other identifiers of J.C.; during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: Wire Fraud as described above in Count 3, which count is incorporated herein by reference, knowing that the means of identification belonged to another actual person; all in violation of 18 U.S.C. § 1028A(a)(1), Aggravated Identity Theft.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

TRINA A. HIGGINS
United States Attorney



ADAM ELGGREN
Assistant United States Attorney